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March 14, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Adak Eagle Enterprises, LLC Request Reply
WC Docket 10-90

Dear Ms. Dortch:

On behalf and at the direction of Adak Eagle Enterprises, LLC ("AEE"), the undersigned counsel hereby submit the attached Reply in support of AEE's Petition for Reconsideration requesting reconsideration of the Federal Communications Commission's decision to deny AEE a second offer of support under the Alternative Connect America Cost Model pursuant to the December 20, 2016 Report and Order and Further Notice of Proposed Rulemaking, FCC 16-178.

Should you have any questions concerning the foregoing information, please contact the undersigned.

Respectfully submitted,

/s/Paul C. Besozzi
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

To: Chief, Wireline Competition Bureau

REPLY OF ADAK EAGLE ENTERPRISES, LLC

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Dated: Mar. 14, 2017

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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To: Chief, Wireline Competition Bureau

REPLY OF ADAK EAGLE ENTERPRISES, LLC

Adak Eagle Enterprises, LLC (“AEE” or “Company”), acting through the undersigned counsel, hereby submits this brief Reply in support of its Petition for Reconsideration (“PFR”) filed January 19, 2017.¹ As the record shows, no opposition or objection to the PFR was submitted, and the only filing made in response to the Commission’s Public Notice announcing the PFR² was a letter supporting AEE’s request.³ As a result, and based in part on the new facts and legal arguments set forth in the PFR, AEE requests that the Commission grant the PFR, reconsider its instruction to the Wireline Competition Bureau (“WCB”) to deny a second Alternative Connect America Cost Model (“A-CAM”) offer to AEE, and promptly make such an offer.

¹ *Petition for Reconsideration*, Adak Eagle Enterprises, WC Docket No. 10-90 (filed Jan. 19, 2017).

² *Petition for Reconsideration for Action in Public Proceeding*, Public Notice, Report No. 3070 (Feb. 1, 2017).

³ *WTA – Advocates for Rural Broadband Comments in Support of Petition for Reconsideration of Adak Eagle Enterprises, LLC*, WC Docket No. 10-90 (filed Mar. 6, 2017).

I. Brief Procedural Background.

On January 19, 2017, AEE filed the PFR in response to the Commission's decision to deny AEE a second offer of support under the A-CAM, as reflected in the Commission's Report and Order and Further Notice of Proposed Rulemaking, FCC 16-178, released December 20, 2016.⁴ Subsequently, on February 1, 2017, the Commission released a Public Notice soliciting oppositions to AEE's PFR.⁵ There were no oppositions or objections filed in response to AEE's PFR. Indeed, one organization—WTA – Advocates for Rural Broadband—filed a letter of support.

II. AEE's Arguments Are Legally Sound And Factually Accurate.

The arguments AEE raised in its PFR are legally sound, factually accurate, and support a decision by the FCC to reconsider its instruction to WCB to deny AEE a second offer. First, the FCC instructed WCB to deny AEE a second offer because the Commission believed AEE was unable to meet 4/1 Mbps speeds required for those carriers receiving a second offer of A-CAM support. As AEE informed the Commission in the PFR, by contracting with a different satellite provider, the Company can now meet the 4/1 Mbps speed. Second, the Commission never required potential recipients of A-CAM support to meet build-out requirements by Dec. 2016, or any other time prior to the end of the 10-year period discussed in the December Order. Finally, the Commission made its decision based on information AEE submitted under different circumstances and in a different proceeding.

⁴ *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No.10-90, FCC 16-178, released December 20, 2016 ("December Order").

⁵ *See supra*, note 2. *See also* Fed. Reg. 2017-03229 (filed Feb. 2, 2017)(setting a deadline of March 4, 2017, for submission of oppositions and March 1, 2017 for replies).

III. Conclusion And Request For Relief.

For the foregoing reasons—and as detailed in AEE’s PFR—AEE respectfully requests that the FCC reconsider its instruction to WCB to deny a second A-CAM offer to AEE and promptly make such an offer .

Respectfully submitted,

/s/Paul C. Besozzi/

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Counsel for Adak Eagle Enterprises, LLC

DECLARATION OF LARRY MAYES
ADAK EAGLE ENTERPRISES, LLC

I, Larry Mayes, am the Chief Executive Officer and President of Adak Eagle Enterprises, LLC (Adak). I have occupied those positions since Adak's inception, and as such, I am familiar with Adak's past and current operations.

I have reviewed the attached Reply Comments, which were prepared pursuant to my direction and oversight. I hereby declare under penalty of perjury that the factual statements and representations therein concerning Adak, its affiliates, and their operations, including current service capabilities, are true and correct.

Executed on this 14th day of March 2017.



Larry Mayes
Chief Executive Officer and President
Adak Eagle Enterprises, LLC